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17 HEWLETT-PACKARD COMPANY

18 UNITED STATES DISTRICT COURT  
19 NORTHERN DISTRICT OF CALIFORNIA

20 PETER SIEGEL,  
21  
22 Plaintiff,  
23  
24 v.  
25  
26 HEWLETT-PACKARD COMPANY  
27  
28 Defendant.

Case No. CV 12-03787 HRL

**DECLARATION OF YVONNE  
BEN FREDJ IN SUPPORT OF  
DEFENDANT HEWLETT-PACKARD  
COMPANY'S REPLY IN SUPPORT OF  
MOTION FOR SUMMARY JUDGMENT**

**DECLARATION OF YVONNE BEN FREDJ**

I, Yvonne Ben Fredj, declare as follows:

1. I hold the position of HR Business Partner within HP Enterprise Services UK Ltd. ("HPES UK Ltd."). I have held this position since February 2013. Before that, beginning in January 2009 I held the position of HR Manager for HPES UK Ltd. Prior to that position, I held the position HR Manager for Electronic Data Systems Ltd. ("EDS UK"). I was an HR Manager during Peter Siegel's employment with EDS UK and HPES UK Ltd. In my position, I had knowledge of the personnel policies that were applicable to the employees in the groups that I supported, and Peter Siegel was an employee of one of the groups that I supported as the HR Manager. In my positions I had personal knowledge regarding which entity employed Mr. Siegel and the other employees in the groups that I supported. The following statements are made of my own personal knowledge and are based on documents or other information kept in the normal course of business. If called upon as a witness in this action, I could and would testify competently hereto.

2. Ian Oldfield, Sean Wells, Clive Freeman, and Cynthia Pye (now known as Cynthia Dunford) are currently employed by HPES UK Ltd. Prior to HP's acquisition of EDS, they were employed by EDS UK. They have never been employed by any other subsidiary of Hewlett-Packard Company.

3. Nick Whalley and Tim Stevenson are currently employed by HPES UK Ltd. Mr. Whalley and Mr. Stevenson were employees of Hewlett-Packard Limited prior to the acquisition of EDS. Mr. Whalley and Mr. Stevenson transferred to HPES UK Ltd. shortly after Hewlett-Packard Company acquired EDS.

1 I declare under penalty of perjury under the laws of the State of California and the United  
2 States of America that the forgoing is true and correct.

3  
4 Executed this 13<sup>th</sup> day of August 2013, at Nottingham, United Kingdom

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7 YVONNE BEN FREDJ